

From: Lancaster.Peter@dorsey.com
Sent: Wednesday, August 14, 2019 11:23 AM
To: Lashway, Scott; O'Malley, Mara
Cc: johnson.kate@dorsey.com
Subject: Ross Production Status

Scott and Mara, as I mentioned yesterday, I thought it would be worthwhile to let you know in writing where we are before we have our call.

As to the four questions in your letter, these are the answers:

- (1) Contracts, etc. with LegalEase – Yes, production should be complete.
- (2) The ROSS Classifier Data Set – Yes, production should be complete.
- (3) The “LPO Data Set” – Yes, we believe production should be complete, though it is not possible for us to say that with total confidence, partly because the documents were transmitted in several different ways and not maintained in consistent locations.
- (4) Internal and external emails from Ross employees: - Yes, production should be complete as to external emails, but internal emails have been gathered but not yet logged or fully reviewed. It takes a few days to gather the contract reviewers, but those should be produced next week.

As to Slack messaging, we had a miscommunication. I thought you were going to see if the email production seemed sufficient before we embarked on that job. We’ve now commissioned the gathering of Slack messages, which will be a very large number, and we can report on status as we proceed.

Some production background:

This is the “hit report” for the terms we used to cull the internal emails::

Search Term	Document count	Family count
Aditya w/2 Lokanandi	8	8
Aditya or Lokanandi	150	251
Chris* w/2 Schmidt	271	430
Schmidt	511	1024
Gayathri w/2 Rajeev	9	22
Gayathri or Rajeev	408	833
Jess* w/2 Sharpe	0	0
Sharpe	55	129
Keethri w/2 Ravindran	0	0
Keethri or Ravindran	7	21
Merin w/2 Sony	18	32
Merin or Sony	340	598
Moon w/2 Saleh	7	7
Moon or Saleh	470	1451

Tariq w/2 Akbar	108	139
Tariq or Akbar	618	879
Tariq w/2 Hafeez	488	682
Tariq or Hafeez	602	813
Teri w/2 Whitehead	490	766
Teri or Whitehead	778	1177
LegalEase	2111	2971
Bulk	1215	2546
Classifier	1240	1565
Westlaw	4490	7146
Total	10135	15866

We are inclined to exclude “Westlaw” because it contains a very large proportion of false hits. E.g., industry newsletters, comments about how one company or another is better than Westlaw, etc. If we remove Westlaw and include review of parent emails that have search term hits, we get 4827 parent e-mails with hits, 6144 total with families.

The custodians whose files we searched are:

- [Arruda Andrew](#)
- [Chapin_Colton](#)
- [Client_Documents](#)
- [DallOglio_Pargles](#)
- [Hamilton_Thomas](#)
- [Isakov_Maxim](#)
- [Killin_Kathleen](#)
- [Ovbiagele_Jimoh](#)
- [VanDerHeijden_Thomas](#)
- [Venkat_Akash](#)

“Client Documents” are relevant client emails that were not attributed to a specific custodian.

Thanks, Peter

Peter Lancaster
DORSEY & WHITNEY LLP
Suite 1500, 50 South Sixth Street
Minneapolis, MN 55402-1498
www.dorsey.com
P: 612.340.7811 F: 612.340.8856

.....
CONFIDENTIAL COMMUNICATION

E-mails from this firm normally contain confidential and privileged material, and are for the sole use of the intended recipient. Use or distribution by an unintended recipient is prohibited, and may be a violation of law. If you believe that you received this e-mail in error, please do not read this e-mail or any attached items. Please delete the e-mail and all attachments, including any copies thereof, and inform the sender that you have deleted the e-mail, all attachments and any copies thereof. Thank you.